

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In re: Higinio Mora  
Debtors

FIRST HERITAGE FINANCIAL LLC,  
Movant,  
v.

Higinio Mora,  
Respondent/Debtors,  
and  
Scott Waterman, Trustee,  
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER  
23-11529-pmm

**OBJECTION OF FIRST HERITAGE FINANCIAL LLC TO CONFIRMATION OF  
DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

FIRST HERITAGE FINANCIAL LLC, by and through its counsel, LOGS Legal Group LLP, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about May 25, 2023, Debtors filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by a mortgage lien on real estate which is not the principal residence of Debtor located at 1922 South Hall Street, Allentown, PA 18103.
3. Movant is in the process of filing its Proof of Claim citing arrears in the amount of \$1,849.02, and a total claim in the amount of \$77,456.63.
4. Debtor's proposed plan calls for the payment to Movant of arrearages in the amount of \$0.00 to be paid to the Trustee through the Plan.
5. The Plan is insufficiently funded to pay Movant its proposed arrearage claim or proposed total debt claim in full.
6. The Plan fails to comply with 11 U.S.C. § 1322.
7. The Plan fails to comply with 11 U.S.C. § 1325.
8. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, FIRST HERITAGE FINANCIAL LLC respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

Dated: July 21, 2023\_\_\_\_\_

BY: /s/ Christopher A. DeNardo  
CHRISTOPHER A. DeNARDO 78447  
LOGS Legal Group LLP  
3600 Horizon Drive, Suite 150  
King of Prussia, PA 19406  
(610) 278-6800/ fax (847) 954-4809

LLG File #:23-068663

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**CERTIFICATE OF SERVICE**

I, Christopher A. DeNardo, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of FIRST HERITAGE FINANCIAL LLC's Objection to the Confirmation of Debtor's Chapter 13 Plan by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on July 21, 2023:

David F. Dunn, Esquire  
21 South 9th Street  
Allentown, PA 18102  
Sent via electronic notification dunnncourtpapers@choiceonemail.com

Scott Waterman, Trustee  
Chapter 13 Trustee  
2901 St. Lawrence Avenue, Suite 100  
Reading, PA 19606  
Sent via electronic notification ecfmil@readingch13.com

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

/s/ Christopher A. DeNardo  
CHRISTOPHER A. DeNARDO 78447  
LOGS Legal Group LLP  
3600 Horizon Drive, Suite 150  
King of Prussia, PA 19406  
(610) 278-6800

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